## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

UNITED STATES OF AMERICA

v. CRIMINAL NO. 1:24cr83-TBM-BWR-1

TYLER SURLA

## MOTION TO CONTINUE TRIAL

COMES NOW the defendant, Tyler Surla, and respectfully requests that the trial in this matter be continued to the next trial calendar.

I.

On this date, the Federal Public Defender was appointed as counsel for Mr. Surla. Trial in this matter is set for the calendar beginning June 30, 2025, with a pretrial conference on June 17, 2025, and a change of plea notification deadline on June 9, 2025.

II.

The undersigned submits additional time is needed to obtain and review the discovery with Mr. Surla, investigate the charges and prepare a defense. For the foregoing reason, the undersigned respectfully requests that the trial be continued to the next court term.

III.

The undersigned contacted Assistant United States Attorney Lee Smith who has no objection concerning the requested continuance.

IV.

The defendant agrees that the period of this continuance be excluded from computations of time for purposes of the Speedy Trial Act.

V.

The Defendant submits that the requested continuance will serve the ends of justice and is not sought for purposes of delay.

WHEREFORE PREMISES CONSIDERED, the Defendant respectfully requests that his Motion be granted and for such other and further relief that the Court deems just and proper.

Respectfully submitted this the 5th day of June 2025.

## TYLER SURLA, Defendant

By: /s/Leilani L. Tynes

Leilani L. Tynes, MB #100074 Assistant Federal Public Defender Southern District of Mississippi 2510 14<sup>th</sup> Street, Suite 902 Gulfport, MS 39501

Phone: (228) 865-1202 Fax: (228) 867-1907 Email: leilani\_tynes@fd.org

Attorney for Defendant

## **CERTIFICATE OF SERVICE**

I, Leilani L. Tynes, do hereby certify that I have this day electronically filed the foregoing Motion with the Clerk of the Court using the ECF system, which sent notification of such filing to the Assistant United States Attorney Lee Smith.

This the 6th day of June 2025.

/s/Leilani L. Tynes
Assistant Federal Public Defender